

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**PAUL J. MANAFORT, JR.,**

**Defendant.**

**Crim. No. 17-201-1 (ABJ)**

**GOVERNMENT'S UNOPPOSED MOTION FOR LEAVE  
TO FILE DOCUMENTS UNDER SEAL**

The United States of America, by and through Special Counsel Robert S. Mueller III, respectfully moves for leave to file under seal documents in support of its opposition to defendant Manafort's motion to modify bail conditions. These documents are submitted as an exhibit hereto. The government's opposition concerns defendant Manafort's ghostwriting of an op-ed to influence public opinion, notwithstanding the Court's order barring the parties and counsel, among others, from making out-of-court statements that could interfere with a fair trial. The government seeks leave to file documentary evidence of that effort, including a copy of the op-ed itself, related communications, and an accompanying declaration. Sealing is appropriate here, because public disclosure of the information would result in making the entirety of the ghostwritten op-ed public and thus cause the very harm the Court's order sought to avoid.

Accordingly, the government requests that the Court grant it leave to file the attached documents under seal. Counsel for defendant Manafort does not oppose the relief sought herein.

Respectfully submitted,

ROBERT S. MUELLER III  
Special Counsel

Dated: December 4, 2017

By: /s/ Andrew Weissmann  
Andrew Weissmann  
Greg D. Andres (D.D.C. Bar No. 459221)  
Kyle R. Freeny  
U.S. Department of Justice  
Special Counsel's Office  
950 Pennsylvania Avenue NW  
Washington, DC 20530  
Telephone: (202) 616-0800

*Attorneys for the United States of America*